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Attorneys for Defendants ALAMEDA COUNTY  
8 SHERIFF'S OFFICE, ALAMEDA COUNTY,  
DEPUTY JOE, and DEPUTY IGNONT  
9 (collectively "ALAMEDA COUNTY  
DEFENDANTS")  
10

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 ALAMEDA COUNTY MALE PRISONERS  
And Former Prisoners, DANIEL  
14 GONZALEZ, et al. on behalf of themselves  
and others similarly situated, as a Class, and  
15 Subclass;

16 ALAMEDA COUNTY FEMALE  
PRISONERS And Former Prisoners, JACLYN  
17 MOHRBACHER, ERIN ELLIS,  
DOMINIQUE JACKSON, CHRISTINA  
18 ZEPEDA, ALEXIS WAH, AND KELSEY  
ERWIN, et al on behalf of themselves and  
19 others similarly situated,

Plaintiffs,

20 v.

21 ALAMEDA COUNTY SHERIFF'S OFFICE,  
ALAMEDA COUNTY, Deputy Joe, Deputy  
22 Ignont (sp) Jane ROEs, Nos. 1 – 25;  
WELLPATH MANAGEMENT, INC., a  
23 Delaware Corporation (formerly known as  
California Forensic Medical Group) a  
24 corporation; its Employees and Sub-  
Contractors, and Rick & Ruth ROEs Nos. 26-  
25 50; ARAMARK CORRECTIONAL  
SERVICES, LLC, a Delaware Limited  
26 Liability Company; its Employees and Sub-  
Contractors, and Rick & Ruth ROES Nos. 51-  
27 75,

Defendants.  
28

Case No. 3:19-cv-07423-JSC

**PARTIES' JOINT STATUS UPDATE PER  
DKT. NO. 408**

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

1 Pursuant to the Court's Order at Dkt. No. 408, the parties hereby provide the following  
2 joint status update:

3 1. The parties attended a Mandatory Settlement Conference before Magistrate Judge  
4 Laurel Beeler on March 6, 2024. The case did not settle. Dkt. No. 409.

5 2. Since March 6, 2024, the parties have been engaged in productive follow-up  
6 settlement meet and confers. The parties met and conferred as a group on March 14. During that  
7 meeting, each Defendant agreed to schedule a separate follow-up meet and confer with Plaintiffs.

8 3. As to the County Defendants, Plaintiffs' counsel and defense counsel met and  
9 conferred on March 19 to discuss Plaintiffs' injunctive relief demands. While the parties have still  
10 not yet reached full agreement, they are close and will continue their discussions both  
11 independently and with Judge Beeler's assistance.

12 4. As to Aramark, Plaintiffs' counsel and defense counsel continue to discuss  
13 Plaintiffs' injunctive relief demands. While the parties have still not yet reached full agreement,  
14 they are close and will continue their discussions both independently and with Judge Beeler's  
15 assistance.

16 5. As to Wellpath, Plaintiffs' counsel and defense counsel continue to discuss possible  
17 monetary settlement values and injunctive relief even though there has been no Class Action status  
18 granted as to Wellpath and the individually named Plaintiffs are not entitled to injunctive relief  
19 against Wellpath.

20 6. The parties intend to continue their settlement discussions and have asked Judge  
21 Beeler for her availability to meet with the parties during the week of March 25 for a further  
22 Mandatory Settlement Conference to assist them with addressing the outstanding settlement  
23 issues.

24 7. In light of the parties' ongoing settlement discussions, the parties respectfully ask  
25 the Court to continue all expert discovery and motion for summary judgment deadlines, as set by  
26 Dkt. Nos. 404 and 408, by 2 additional weeks as follows:

27 ///

28 ///

**Expert Disclosures as to County Defendants Due:** April 4  
**Rebuttal Expert Disclosures as to all Defendants Due:** April 18  
**Close of Expert Discovery:** May 2  
**Dispositive Motion/Motion to Decertify Deadlines:** To be set by Court per Dkt.  
No. 408

The parties will file a further joint update on April 4 to advise the Court if their settlement efforts have been successful or if they intend to move forward with expert discovery and dispositive motions.

8. The parties also agree to continue all expert depositions for another 2 weeks.

Dated: March 21, 2023

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/ Temitayo O. Peters  
Gregory B. Thomas  
Temitayo O. Peters  
Jasper L. Hall  
Kyle Anne Piasecki  
Attorneys for Defendants ALAMEDA  
COUNTY SHERIFF'S OFFICE,  
ALAMEDA COUNTY, DEPUTY JOE, and  
DEPUTY IGNONT (collectively  
"ALAMEDA COUNTY DEFENDANTS")

Dated: March 21, 2024

LAW OFFICES OF YOLANDA HUANG

By: /s/ Yolanda Huang  
Yolanda Huang  
Attorneys for Plaintiffs

Dated: March 21, 2024

LAW OFFICES OF THOMAS E. NANNEY

By: /s/ Thomas E. Nanney  
Thomas E. Nanney  
Attorneys for Plaintiffs

///

1 Dated: March 21, 2024

2  
3 By: /s/ Richard A. Brody

4 Richard A. Brody  
Attorneys for Plaintiffs

5 Dated: March 21, 2024

MORGAN LEWIS AND BOCKIUS LLP

6  
7 By: /s/ Charles Reitmeyer

8 Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
9 Attorneys for Defendant

10 Dated: March 21, 2024

BERTLING LAW GROUP, INC.

11  
12 By: /s/ Peter G. Bertling

13 Peter G. Bertling  
Attorneys for Defendant  
14 CALIFORNIA FORENSIC MEDICAL  
GROUP, INC.

15  
16 **DECLARATION REGARDING AUTHORIZATION**

17 Under N.D. Cal. Local Rule 5-1(i)(3), I attest that I obtained authorization in the filing of  
18 this document from the other signatories listed here.

19 By: /s/ Temitayo O. Peters

20 Temitayo O. Peters, Esq.

**[PROPOSED] ORDER**

PURSUANT TO the parties' stipulated request, and good cause appearing, all expert discovery and motion for summary judgment deadlines set by Dkt. Nos. 404 and 408 are continued by 2 weeks:

**Expert Disclosures as to County Defendants Due:** April 4

**Rebuttal Expert Disclosures as to all Defendants Due:** April 18

**Close of Expert Discovery:** May 2

**Dispositive Motion/Motion to Decertify Deadlines:** To be set by Court per Dkt.  
No. 408

**IT IS SO ORDERED.**

DATED:

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U.S. District Judge Jacqueline Scott Corley